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March 24, 2017

Via Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Room TW-A325
Washington, DC 20554

**Re: In the Matter of Lifeline and Link Up Reform and Modernization
Notice of Forbearance from Lifeline BIAS Requirements
WC Docket No. 11-42**

Pursuant to the *Lifeline Modernization Order*¹ and the *BIAS Forbearance Public Notice*,² as an authorized representative of Union Telephone Company ("Union"), I hereby submit this Notice of Forbearance from Lifeline broadband internet access service ("BIAS") requirements in certain portions of Union's Eligible Telecommunications Carrier ("ETC") service area.

Union is a rural incumbent local exchange carrier that has elected to receive support under the Alternative Connect America Cost Model ("A-CAM"). Union now provides notice that it is availing itself of the Commission's forbearance relief for those census blocks within its ETC service area that are not funded by A-CAM. In support of this notice, Union provides the following information:

1. *Carrier Name*: Union Telephone Company (SAC 512297)
2. *ETC Designation Information*:
 - a. *Designation Order*: Docket No. 70008-TA-97-26, Order No. 1697 (Wyo. Pub. Svc. Comm'n, Sept. 2, 1997).
 - b. *Designating Authority*: Wyoming Public Service Commission.

¹ *Lifeline and Link Up Reform and Modernization et al., Third Report and Order, Further Report and Order, and Order on Reconsideration*, 31 FCC Rcd 3962 (2016) ("Lifeline Modernization Order").

² *Wireline Competition Bureau Provides Guidance Regarding Filing Procedures for Eligible Telecommunications Carriers Seeking to Invoke Forbearance Granted by Lifeline Modernization Order, Public Notice, WC Docket No. 11-42, DA 16-1316 (WCB. rel. November 22, 2016)* ("BIAS Forbearance Public Notice").

- c. *Type of Designation*: High-cost and Low-Income (not Lifeline-only).
 - d. *Date of ETC Designation*: September 2, 1997.
3. *Areas Where Union Elects Forbearance*: Attached as Appendix A is an Excel spreadsheet containing a list of census blocks, in numerical order by FIPS code, representing the areas in which Union is electing forbearance.
 4. *Date and Reason for Change*: Union received its first A-CAM payment on February 28, 2017. Therefore, as of that date, Union no longer receives high-cost support in the census blocks unfunded by A-CAM and does not have high-cost broadband obligations in those areas. Union is eligible for forbearance in those census blocks and timely files this notice within 30 days of the qualifying change.³ In the census blocks that are funded by A-CAM, Union is subject to broadband Lifeline obligations only to the extent it commercially offers qualifying broadband pursuant to its high-cost broadband obligations.⁴

Notwithstanding this forbearance filing and in accordance with the *Lifeline Modernization Order*, Union reserves the right to offer and receive reimbursement for providing Lifeline-supported BIAS to eligible subscribers.⁵

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³ See *Lifeline Modernization Order*, *supra*, 31 FCC Rcd at 3974, 4074 (¶¶ 35, 311).

⁴ See *id.* at 4074 (¶ 311).

⁵ See *BIAS Forbearance Public Notice*, *supra*, at p. 2, *Lifeline Modernization Order*, *supra*, 31 FCC Rcd at 4075 (¶ 312).

Secretary Marlene H. Dortch
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Please contact the undersigned if you have questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Steven M. Chernoff". The signature is fluid and cursive, with a prominent "S" and "M".

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cc: TelcoLifeline@usac.org